



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

BGF Industries, Inc.
c/o Ms. Remonia Davis
Environmental Manager
401 Amherst Ave.
Altavista, VA 24517

Date: 4/23/01

RE: Site Characterization Report for BGF Industries, Inc's Altavista, Virginia facility.

Dear Ms. Davis:

This letter is in response to BGF Industries Inc's (BGF) Site Characterization Report, submitted by Alston and Bird LLP on April 3, 2001 on behalf of BGF, to the U.S. Environmental Protection Agency, Region III ("EPA"), describing assessment activities conducted to define the extent of polychlorinated biphenyl ("PCB") contamination at BGF's facility in Altavista, Virginia. ATC Associates Inc. ("ATC") conducted the assessment on behalf of BGF.

EPA will review BGF's Site Characterization Report to ensure that the information is consistent with the requirements of the *Site Characterization* regulations at 40 C.F.R. § 761.61(a)(2). EPA's review of BGF's Site Characterization Report does not in any way constitute a finding by EPA that the assessment and associated report is complete and/or provides the characterization information required by 40 C.F.R. § 761.61(a)(2), in order to conduct a site cleanup based upon the *self-implementing site cleanup* regulations found at 40 C.F.R. 761.61(a)(3)(A - E). If deficiencies in the Site Characterization Report are noted, EPA will respond by written letter, indicating what the deficiencies are, so as to provide BGF with the opportunity to correct the deficiencies, prior to the anticipated submittal of a *self-implementing site cleanup workplan*, based upon 40 C.F.R. § 761.61(a). EPA emphasizes that these regulations include several conditions and limitations that apply to persons performing "self-implementing on-site cleanup and disposal of PCB remediation waste." Among other things, the regulations state that "[c]omplete compliance with 40 C.F.R. § 761.61(a) does not create a presumption against enforcement action for penalties for any unauthorized PCB disposal." 40 C.F.R. § 761.50(b)(3)(ii)(B). Further, "[a]ny person storing or disposing of PCBs is also responsible for determining and complying with all other applicable Federal, State, and local laws and regulations". 40 C.F.R. § 761.50(a)(6).

EPA also wants to make clear that there is no associated time limit for reviewing the Site Characterization Report. It is the responsibility of BGF et al, to provide the information required by 40 C.F.R. § 761.61(a)(3)(A - E), when submitting the cleanup workplan. Please direct any questions in this matter to:

U.S. Environmental Protection Agency
Region III
Mr. Scott Rice
Waste and Chemicals Management Division
1060 Chapline Street
Wheeling, WV 26003

Any questions concerning the Site Characterization Report and/or self-implementing site cleanup plan should be directed to Mr. Rice at 304 231 0501.

Sincerely,

James Burke, Director
Waste and Chemicals Management Division

Enclosure

cc: Dr. Khizar Wasti, VADOH
Ms. Erica Dameron, VADEQ
Dr. Michael Scanlon, VADEQ
Mr. Eric Shertzer, ATC